

1 Kimberly A. Wright, Esq. (265899)  
2 **REVOLVE LAW GROUP LLP**  
3 2601 Main Street, Suite 1200  
4 Irvine, CA 92614  
5 T: 833-775-4557  
6 F: 888-711-7710

7  
8 Attorneys for Defendant,  
9 FAST ADVANCE FUNDING LLC  
10

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
13

14 DAVID M. DOYLE,  
15 PLAINTIFF,  
16  
17 vs.  
18  
19 FAST ADVANCE FUNDING LLC,  
20  
21 DEFENDANT.

Case No.: 2:18-CV-5412-DMG-FFM  
Hon. Dolly M. Gee

**DEFENDANT FAST ADVANCE  
FUNDING, LLC'S INITIAL  
DISCLOSURES PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 26(a)(1)(A)(i)-(iv)**

22 Defendant Fast Advance Funding LLC ("Defendant"), through its counsel  
23 Revolve Law Group LLP, hereby files its initial disclosures pursuant to Federal  
24 Rule of Civil Procedure 26(a)(1)(A)(i)-(iv).

25 (i) Individuals likely to have discoverable information are as follows:

26 (1) Danny Martinez, Defendant's employee in charge of IT. Mr.  
27 Martinez can provide information as to the dialer system of Defendant,  
28 including number validation and removal.

1 (2) Steve Marucci, Defendant's employee that communicated with  
2 Plaintiff. Mr. Marucci can provide information as to communications with  
3 Plaintiff.

4 (3) Anthony Gibson, Defendant's employee in charge of sales. Mr.  
5 Gibson can provide information as to how the sales of Defendant are  
6 accomplished.

7 (ii) Description of documents used to support defenses are as follows:

8 (1) Dialer Number Removal Policies & Procedure.

9 (iii) Damages Calculations - N/A

10 (iv) Available insurance policies to cover potential liability - None  
11

12 Dated: September 13, 2018

**REVOLVE LAW GROUP LLP**

13 By: /s/ Kimberly A. Wright

14 Kimberly A. Wright

15 Attorneys for Defendant Fast Advance  
16 Funding LLC  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 13, 2018, I electronically filed the  
 3 foregoing with the Clerk of the Court for the United States District Court for the  
 4 Central District of California using the CM/ECF system. I certify that all  
 5 participants in the case are registered CM/ECF users and that service will be  
 6 accomplished by the CM/ECF system. I hereby certify that participants in the case  
 7 that are not registered CM/ECF users shall receive service via First Class regular  
 8 mail and electronic mail as shown on the service list below.

9  
 10 /s/ Kimberly A. Wright

11 Kimberly A. Wright

12  
 13 **SERVICE LIST**

14  
 15 David Doyle  
 16 710 S. Myrtle Ave.  
 17 Ste 257  
 18 Monrovia, CA 01016  
 19 davedoyle9@gmail.com  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28